

1 MCGREGOR W. SCOTT
United States Attorney
2 KEVIN C. KHASIGIAN
Assistant U.S. Attorney
3 501 I Street, Suite 10-100
Sacramento, CA 95814
4 Telephone: (916) 554-2700

5
6 Attorneys for the United States

7
8 IN THE UNITED STATES DISTRICT COURT
9 EASTERN DISTRICT OF CALIFORNIA

10
11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 APPROXIMATELY \$32,340.00 IN
U.S. CURRENCY,
15 Defendant.
16

CASE NO. 1:20-MC-00111-AWI

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimant
18 Sandra Castillo (“claimant”), by and through their respective counsel, as follows:

19 1. On or about July 27, 2020, claimant filed a claim in the administrative forfeiture
20 proceeding with the U.S. Postal Inspection Service with respect to Approximately \$32,340.00 in U.S.
21 Currency (hereafter “defendant currency”), which was seized on May 28, 2020.

22 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required
23 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file
24 a claim to the defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant
25 has filed a claim to the defendant currency as required by law in the administrative forfeiture
26 proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant

1 currency is subject to forfeiture within ninety days after a claim has been filed in the administrative
2 forfeiture proceeding, unless the court extends the deadline for good cause shown or by agreement of the
3 parties. That deadline was October 25, 2020.

4 4. By Stipulation and Order filed October 27, 2020, the parties stipulated to extend to
5 December 24, 2020, the time in which the United States is required to file a civil complaint for forfeiture
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
7 subject to forfeiture.

8 5. By Stipulation and Order filed December 22, 2020, the parties stipulated to extend to
9 February 22, 2021, the time in which the United States is required to file a civil complaint for forfeiture
10 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
11 subject to forfeiture.

12 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
13 April 23, 2021, the time in which the United States is required to file a civil complaint forfeiture against
14 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
15 forfeiture.

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to April 23, 2021.

Dated: February 19, 2021

McGREGOR W. SCOTT
United States Attorney

By: /s/ Kevin C. Khasigian
KEVIN C. KHASIGIAN
Assistant U.S. Attorney

Dated: February 19, 2021

By: /s/ Yan E. Shrayberman
YAN E. SHRAYBERMAN
Attorney for Potential Claimant
Sandra Castillo
(Signature authorized by email)

IT IS SO ORDERED.

Dated: February 19, 2021



SENIOR DISTRICT JUDGE